

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONNA WOOD, ET AL., individually and on
behalf of those similarly situated,

Plaintiffs,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

No. 20 Civ. 2489 (LTS) (GWG)

**[PROPOSED] ORDER GRANTING PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

Upon consideration of Plaintiffs' Motion for Class Certification and Defendant's opposition thereto, and all other pertinent parts of the record, IT IS HEREBY ORDERED that the Motion is GRANTED, as follows:

1. Plaintiffs' Claims are certified pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(3) on behalf of the Classes defined as follows:

- A. all individuals employed as a Field Organizer by Mike Bloomberg 2020, Inc. in California between the period November 24, 2019 and March 31, 2020 ("California Class").
- B. all individuals employed as a Field Organizer by Mike Bloomberg 2020, Inc. in New York between the period November 24, 2019 and March 31, 2020 ("New York Class").
- C. all individuals employed as a Field Organizer by Mike Bloomberg 2020, Inc. in Illinois between the period November 24, 2019 and March 31, 2020 ("Illinois Class").
- D. all individuals employed as a Field Organizer by Mike Bloomberg 2020, Inc. in North Carolina between the period November 24, 2019 and March 31, 2020 ("North Carolina Class").

- E. all individuals employed as a Field Organizer by Mike Bloomberg 2020, Inc. in Michigan between the period November 24, 2019 and March 31, 2020 (“Michigan Class”).
- F. all individuals employed as a Field Organizer by Mike Bloomberg 2020, Inc. in Wisconsin between the period November 24, 2019 and March 31, 2020 (“Wisconsin Class”).
- G. all individuals employed as a Field Organizer by Mike Bloomberg 2020, Inc. in Minnesota between the period November 24, 2019 and March 31, 2020 (Minnesota Class”).

2. Plaintiffs are appointed Class Representatives as follows:

- A. Plaintiffs Alexandra Marie Wheatley-Diaz, Robin Ceppos, and Nicholas Coker are appointed Class Representatives of the California Class.
- B. Plaintiff Max Goldstein is appointed Class Representative of the New York Class.
- C. Plaintiff Caelan Doherty is appointed Class Representative of the Illinois Class.
- D. Plaintiff James Kyle Newman is appointed Class Representative of the North Carolina Class.
- E. Plaintiff Lakisha Watson-Moore is appointed Class Representative of the Michigan Class.
- F. Plaintiff Tristan Angulo is appointed Class Representative of the Wisconsin Class.
- G. Plaintiff Bridget Logan is appointed Class Representative of the Minnesota Class.

3. Outten & Golden LLP and Shavitz Law Group, P.A. are appointed as Class Counsel for the Classes.

4. The parties are directed to confer regarding an appropriate notice for the Classes and submit a stipulation regarding the notice, or a letter detailing any disputes, within 30 days of this order.

IT IS SO ORDERED.

Dated:

Laura Taylor Swain
United States District Judge